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December 30, 2024

**BY ECF**Honorable Frederic Block  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201Re: *Teamsters Local Union 804, et al. v. City of New York, et. al –*  
24-CV-08683 (FB)(TAM)

Your Honor:

I am co-counsel for Plaintiffs in the above matter. I write jointly with Defendants to provide the Court with the status update contemplated by the parties' last joint letter.

**Plaintiffs' position:** The strike at Amazon's DBK4 facility has ended, and so, the immediate emergency and need for a temporary restraining order is over. Plaintiffs therefore withdraw their request for a temporary restraining order. As to Plaintiffs' request for a preliminary injunction, however, Amazon has continued its campaign of retaliation and other unlawful conduct to undermine and destroy unionizing efforts. As such, Plaintiffs are considering further collective action – including potential strikes and pickets like the one that led to this lawsuit - at Amazon's DBK4 facility and/or other New York City locations, possibly within the next several weeks, and very likely within the next six months. Plaintiffs therefore intend to move forward with their pending request for a preliminary injunction, though not on the same emergency basis. Plaintiffs ask that the Court allow the parties to meet and confer in the coming weeks, and jointly report back with a proposed briefing schedule on Plaintiffs' application for a preliminary injunction, on or before January 21, 2025.

**Defendant City's position:** Defendants do not believe that a preliminary injunction is warranted at this time. However, defendants agree that it would appropriate for the parties to meet and confer and provide the Court with a proposed briefing schedule, if needed, on or before January 21, 2025.

The parties jointly thank Your Honor for the Court's attention to these matters.

Respectfully submitted,

Gideon Orion Oliver